



# Non-Discrimination & Anti-Harassment Directive

Document owner

Approval

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Applicability

EVP & Chief People & Culture Officer

CEO and CFO

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Group

# Non-Discrimination & Anti-Harassment Directive

## 1. Purpose statement and scope

Viaplay Group is dedicated to providing a harassment-free and inclusive working environment for everyone at our company, regardless of gender identity and expression, sexual orientation, physical or mental disabilities, ethnicity (includes race relations in the UK), nationality, age, religion or any other protected category.

Everyone at Viaplay Group, whatever their role, has a personal responsibility to treat everyone they meet at work with respect. Everyone can help to prevent harassment in the workplace by thinking about their choice of words and conduct, challenging unacceptable conduct by others and supporting anyone who experiences harassment.

This Group Directive covers harassment both on Viaplay Group's premises and in professional contexts outside these premises, such as business trips or work-related social functions.

The ultimate responsibility for preventing harassment at Viaplay Group lies with the company's President and CEO.

## 2. Definitions

### 2.1 What is harassment?

In general terms, harassment is defined as unwanted conduct that affects a person's dignity in the workplace or that creates an intimidating, hostile, degrading, humiliating, or offensive working environment.

Harassment can take many forms. It may be physical, verbal or be expressed via telephone calls, emails, social media messages or other means of communication.

It can include jokes or gestures. Actions or comments that one person considers harmless may not be seen in the same light by the recipient. It is always the recipient who decides what is acceptable or not.

### 2.2 What is sexual harassment?

In general terms, this is harassment specifically based on sex. It can include unwelcome sexual advances and requests for sexual favours. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can be of both verbal and physical nature and can take place regardless of the gender, gender identity or gender expression of the individuals involved. It can, for example, occur between same-sex individuals as well as between opposite-sex individuals. In addition, sexual harassment must not necessarily be motivated by sexual desire.

### 3. How do we prevent harassment at Viaplay Group?

We have zero tolerance for any type of harassment and discrimination, so we take allegations seriously and handle them confidentially. If allegations are confirmed, we make sure necessary actions will be taken.

You can choose to address the issue personally, or you can always ask your manager, a colleague, or a member of Viaplay Group's People and Culture function for help. All reports of harassment will be systematically investigated, and certain prohibited behaviours could result in disciplinary action up to and including termination following the applicable labor law.

### 4. How can I report discrimination or harassment?

Viaplay Group encourages everyone to raise any concerns about harassment at the earliest possible stage. All matters are handled fairly, confidentially, professionally and anyone can report concerns without fear of retaliation and/or fear of being silenced and/or damaged in any way because they raised a concern.

Where possible and if appropriate, bullying, harassment and discrimination may be resolved informally by first making the person aware that their behavior is unacceptable and asking that person to stop the behavior.

If you do not feel able, comfortable, or willing to deal with the issue in this way and you wish to make a formal complaint, there are different channels to formally report a concern. Either via your line manager or your manager's manager or contact Viaplay Group's People and Culture function.

We recognise that there may be circumstances when you are not comfortable reporting a concern openly. Therefore, you can also report a concern anonymously by using our Speak-Up Line (either via the web portal or by using one of the freephone lines available in the majority of the jurisdictions in which we operate). The Speak-Up Line is operated by a third party and is available 24/7, 365 days per year. The Speak-Up Line is found on our ViaPLACE at: [Our Whistleblower system](#). There you will also find more information about our whistleblower procedures.

Please note that due to national data protection regulations, the scope of issues that can be reported and who can be the subject of a whistleblowing report via Speak-Up Line vary between countries. In countries with stricter data protection regulations, only conduct by key personnel or employees in management position may be reported, for example.

Nothing in this policy may prevent the complainant or the respondent from pursuing formal legal remedies or resolution through local, state or federal agencies or the courts.

## 5. Confidentiality

Viaplay Group is committed to respecting the privacy and personal data of everyone at our company. Confidentiality is also an important part of the procedures described in this Group Directive. In order to investigate concerns from or regarding our people, it may be necessary to process and transfer personal data within the company. In such cases, Viaplay Group complies with all applicable data protection rules. Details of an investigation, the complainant and the accused should only be disclosed on a 'need to know' basis, and any breach of confidentiality may give rise to disciplinary action.

Information about a complaint, either by or about an employee, may be placed on the employee's file, along with details of the outcome of the investigation and any notes or documents compiled during this process.

## 6. Document history and change information

For more details of this Group Directive's document history and change information, see [Appendix 1](#).

## Appendix 1 – Document History and Change Information

Version	Revision Date	Change information
1	2020-02-25	Initial Group Directive.
2	2021-06-07	Separated Non-Discrimination & Anti-Harassment Directive from the EDI Directive
3	2022-01-11	No changes.